Pollution Prevention (P2)

POC x 2444

P2 is the Army preferred method for solving environmental compliance problems. P2 emphasizes reduction of wastes at the source, targeting the design phase and shop level, rather than the users, to prevent problems before they occur.

Why are we required to have a P2 program?

Fort Monroe is required by Executive Order (EO) 13101, EO 12856, and the Pollution Prevention Act of 1990 to have a Pollution Prevention program that actively reduces the amount of emissions Fort Monroe produces.

The Pollution Prevention Act of 1990

The Pollution Prevention Act of 1990 was enacted on November 5, 1990. This Act established pollution prevention as national policy in the United States. The term pollution prevention is defined in the Act as follows:

... any practice which reduces the amount of a hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal; and any practice which reduces the hazards to public health and the environment associated with the release of such substances, pollutants, or contaminants.

Practicing pollution prevention requires a change in the Army's approach to environmental management from traditional pollution control techniques to source reduction techniques. This change is demonstrated using the waste management hierarchy.

Pollution Prevention

Preventing or reducing waste/emissions/pollution at the source is the number one recommended way to approach emission management.

Recycling

If a waste stream can not be eliminated or reduced, determine a beneficial re-use or recycling option.

Treatment

If a waste can not be eliminated or recycled, treat the waste so it is less harmful to human health and the environment as well as easier to manage.

Disposal

Is the last option for managing a waste and should be considered only after the all other options have been considered.

Additionally, practicing pollution prevention requires closing the loop on recycled material by purchasing items the contain post consumer recycled content. The EPA has designated items that the federal government is required to purchase with post consumer content. This practice of buying recycled content items is known as **Affirmative Procurement**.

The Pollution Prevention Act is not limited to hazardous waste or chemicals subject to Toxics Release Inventory (TRI) reporting. It also encompasses all hazardous substances, pollutants, or contaminants.

EO 12856

President Clinton included federal agencies in the Pollution Prevention Act when he signed EO 12856, *Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements* in October, 1993. EO 12856 set the Federal Government's policy on pollution prevention. In the text of the executive order, the President noted:

...federal facilities will set the example for the rest of the country and become the leader in applying pollution prevention to daily operations, purchasing decisions and policies. In the process, federal facilities will reduce toxic emissions, which helps avoid cleanup costs and promotes clean technologies.

EO 12856 requires federal facilities to report TRI releases and to set agency goals of reducing TRI reportable releases by 50 percent by 1999. EO 12856 requires federal facilities to develop written pollution prevention plans. It also requires agencies to conduct assessments of their facilities to ensure development of pollution prevention programs. Fort Monroe accomplished this goal by issuing the Fort Monroe Pollution Prevention Plan in December of 1995. Fort Monroe's P2 Plan is updated annually.

EO 13101

Executive Order 13101, *Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition*, requires federal agencies to comply with Affirmative Procurement (AP) guidelines set forth by the Office of Federal Procurement Policy and the EPA. Federal agencies are required to develop an AP program in accordance with 6002 of RCRA. The EO also emphasizes the importance of pollution prevention in daily activities in any federal agency.

Army Regulation 200 -1

The Department of the Army (DA) has also issued regulations that stress minimizing the negative effects of the Army's activities on the environment. Army Regulation (AR) 200-1, *Environmental Quality: Environmental Protection and Enhancement*, prescribes DA responsibilities, policies, and procedures for preserving, protecting, and restoring the quality of the environment. AR 200-1 sets the Army's policy for hazardous waste minimization. It requires Army installations to reduce the quantity or volume and the toxicity of hazardous wastes whenever economically practical or environmentally necessary.

What are Fort Monroe's current P2 initiatives?

Fort Monroe is always looking for innovative P2 options. A great example of this is the Post deconstruction efforts. Instead of demolition the DPW is using deconstruction to take buildings apart and salvage re-usable and recyclable building components. This has allowed Fort Monroe to divert up to 80% of a building out of the landfill!

Aqueous brake washers and parts washers have been implemented into the Auto Craft Shop, Motor Pool, and Navy Dock. These environmentally friendly machines have reduced the need for aerosol based cleaners that are potentially hazardous substances.

The Old Point Comfort Marina received TRADOC P2 funding to purchase an industrial meat grinder and produce chum from fish scraps. The chum is sold as bait at the marina. This project turned an organic waste stream and water quality issue into a source of income for the marina.

For more information contact the Environmental Office at 788-2444.

What can I do to help?

The best P2 ideas come from the people who actually work with waste generating activities, not the P2 Program Manager. If you, or a co-worker, have an idea to reduce Fort Monroe's environmental impact, please feel free to call the P2 Program manager at x 2444. We can reduce Fort Monroe's environmental impact by reducing the amount of water, energy, or chemicals we use or by reducing the amount of waste we produce – either solid waste or hazardous waste. The P2 Program Manager will work with organizations to fully develop ideas and submit funding requests for P2 funding through headquarters.

Even if your office doesn't generate a lot of waste, there are plenty of things you can do to further Fort Monroe's P2 program and environmental effort in general. Here are just a few.

- Participate in the Post recycling program. This is actually Army Policy and the responsibility of everyone on Post. The Post Recycling Center is located at building 81. Individuals can drop off aluminum cans, newspapers, cardboard, and white paper. Most administrative buildings on Post have pick up for aluminum cans, white paper, and cardboard. If you need a special pick-up or are experiencing problems with pick-ups, please call x 3166 or x 2444.
- Purchase items with recycled content. These items are easy to identify in the GSA catalogs by the green recycling symbol.



Turn in unused old paint, automotive products, pesticides, fertilizers, and other household
hazardous chemicals into your city's household hazardous waste drop-off center. Post
residents are allowed to use the city of Hampton's program. For more information see:
 http://www.hampton.va.us/publicworks/household-chemical-collection.html

What are upcoming P2 initiatives?

Fort Monroe is focusing its P2 effort on reducing solid waste and increasing awareness of affirmative procurement requirements. Pet waste stations are going to be implemented around Post to help combat pet waste pollution. Watch for continual improvements in our recycling program and the green purchasing program.